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Jackson Lewis P.C.
150 North Michigan Avenue
Suite 2500
Chicago, Illinois 60601
Tel 312 787-6049
Fax 312 787-4995
www.jacksonlewis.com

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MY DIRECT DIAL IS: 312-803-2507
MY EMAIL ADDRESS IS: GASPERIS@JACKSONLEWIS.COM

May 25, 2016

VIA E-MAIL (JJORDAN@FEC.GOV &
MDEBEAU@FEC.GOV)

Mr. Jeff S. Jordan
Federal Election Commission
Office of Complaints Examination and
Legal Administration
999 E Street, NW
Washington, D.C. 20436

CONFIDENTIAL – SUBMITTED FOR
INVESTIGATIVE PURPOSES ONLY

Re: MUR # 7050

Dear Mr. Jordan:

We represent Respondent Chicago Signature Services, LLC ("CSS") in the above-referenced matter under review. This letter constitutes CSS's response to the allegations contained in Chris P. Smola's complaint. Mr. Smola asserts that CSS and the union of which he is a member, UNITE HERE Local 1 ("Local 1," have fraudulently solicited funds in violation of the Bipartisan Campaign Reform Act of 2002, Title III misc. Section 309. As we explain briefly below, CSS has neither solicited funds from Mr. Smola nor violated any other aspect of the Federal Election Campaign Act of 1971 ("FECA"). Thus, his complaint is appropriate for immediate dismissal.

Mr. Smola authorized a contribution in the amount of \$1.00 per month to the UNITE HERE TIP Campaign Committee ("TIP"). CSS processed his monthly contribution to TIP through a payroll deduction and then transmitted those funds to TIP's trustee, consistent with Article 2.5 of its collective bargaining agreement with Local 1. FECA explicitly permits the use a payroll-deduction or check-off system to collect contributions to a labor organization's PAC. See 11 C.F.R. § 114.2(f)(4)(i).

These voluntary payroll deductions for TIP continued month to month until Mr. Smola requested they cease. As Mr. Smola admits in his complaint, when he contacted CSS in February 2013 to request that further TIP deductions cease, CSS immediately obliged his request.

Should you require any additional information, please feel free to contact me or one of my colleagues.

Very truly yours,

JACKSON LEWIS P.C.


Sarah J. Gasperini

SJG/

cc: Robert J. Horn, Esq. (Robert.Horn@jacksonlewis.com)
James D. Thomas, Esq. (James.Thomas@jacksonlewis.com)

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